

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
NORTHERN DIVISION

**ROY HOLMES, TINA ALEXANDER,
and PATRICK NORRIS, and MELISSA GARNER,
Each individually and on Behalf of All
Others Similarly Situated**

PLAINTIFFS

vs.

Case No. 4:20-cv-191-DPM

**STETSON COURIER, INC.
and JOHN STETSON**

DEFENDANTS

OBJECTION TO APPLICATION OF WRIT OF GARNISHMENT

Defendants Stetson Courier, Inc. and John Stetson, (collectively, Defendants), by and through their attorneys, ROSE LAW FIRM, A PROFESSIONAL ASSOCIATION, and for their Objection to Plaintiffs' Application for Writ of Garnishment (ECF No. 151), state:

1. The Court entered judgment against Defendants in the total amount of approximately \$134,823.09. *See* ECF Nos. 138, 147.
2. Consistent with previous representations made to this Court and as acknowledged by Plaintiffs, Defendants are remitting payments toward the judgment to counsel for Plaintiffs.
3. Defendants have represented to undersigned counsel that the amounts being remitted are all that Defendants can afford to pay.
4. Plaintiffs acknowledge that Defendants are making payments consistent with the understanding between the parties. *See* ECF No. 151.
5. Upon information and belief, the account J.P. Morgan Chase Bank account referenced in Plaintiffs' Application for Writ of Garnishment is Defendants' operating account.
6. In the event Plaintiffs garnish the operating account, Defendants would be unable to continue operating their business.

7. Defendants are in the business of delivering medicine and other medical supplies to customers. If Defendants were to cease operations, numerous customers in various states would not receive their medical deliveries.

8. Accordingly, Defendants respectfully request that the Court deny Plaintiffs' Application for Writ of Garnishment.

WHEREFORE, Defendants respectfully request that the Court enter an Order denying Plaintiffs' Application for Writ of Garnishment.

Respectfully submitted,

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